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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

**UNITED STATES OF AMERICA,  
*ex rel.* WENDY A. BAHNSEN, et al.,**

Plaintiffs/Relators,

v.

**BOSTON SCIENTIFIC  
NEUROMODULATION CORPORATION,**

Defendant.

**Civil Action No. 11-cv-1210  
(JMV) (SCM)**

**NOTICE OF MOTION FOR  
ATTORNEYS' FEES, COSTS AND  
EXPENSES PURSUANT TO 31  
U.S.C. § 3730(d)**

**MOTION DAY: JULY 15, 2019**

**ORAL ARGUMENT  
REQUESTED**

**BOSTON SCIENTIFIC  
NEUROMODULATION CORPORATION,**

Counterclaim-Plaintiffs,

v.

**WENDY BAHNSEN AND CAROLINA  
FUENTES,**

Counterclaim-Defendants.

TO: THE CLERK OF COURT AND ALL COUNSEL OF RECORD

**PLEASE TAKE NOTICE** that on July 15, 2019, at 9:30 a.m., or as soon thereafter as counsel may be heard, Susman Godfrey L.L.P. and McManimon, Scotland & Bauman LLC, attorneys for Relators/Counterclaim-Defendants, will move before the Honorable John Michael Vazquez, United States Judge for the District of New Jersey, at the Frank R. Lautenberg U.S. Post Office and Courthouse, 2 Federal Square, Newark, NJ 07102, for an Order granting their Motion for Attorneys' Fees, Costs and Expenses pursuant to 31 U.S.C. § 3730(d).

**PLEASE TAKE FURTHER NOTICE** that, in support of this motion, Plaintiffs/Relators will rely upon the accompanying Memorandum of Law in Support of its Motion, Declaration of Jordan Connors, Declaration of Justin P. Walder, and Proposed Order, as well as all pleadings and other documents filed with the Court in this matter.

Relators respectfully request oral argument.

Dated: June 21, 2019

By: s/ Grant W. McGuire  
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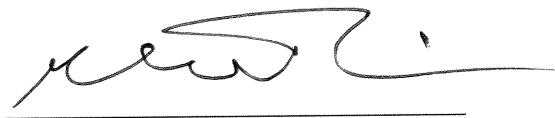
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*Attorneys for Relators/Counterclaim-Defendants*

**CERTIFICATE OF SERVICE**

I certify that on June 21, 2019 a copy of this document was filed using the Court's CM/ECF system. Copies of this document have been served by electronic means on all registered users of the Court's CM/ECF system who have appeared in this case.



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Grant W. McGuire, Esq.